

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Western District of Texas**FILED**

August 24, 2022

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXASUnited States of America
v.
Veronica RODRIGUEZ-HernandezBY: Fidel Morales
DEPUTY

Case No.

EP: 22-M-2084-MAT

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 23, 2022 in the county of El Paso in the
Western District of Texas, the defendant(s) violated:*Code Section*

21 U.S.C. 841

Offense Description

Knowingly and intentionally possessed with intent to distribute a Controlled Substance namely Fentanyl; a quantity to wit; approximately 2.25 kilograms (total weight), a Schedule II Controlled Substance;

This criminal complaint is based on these facts:

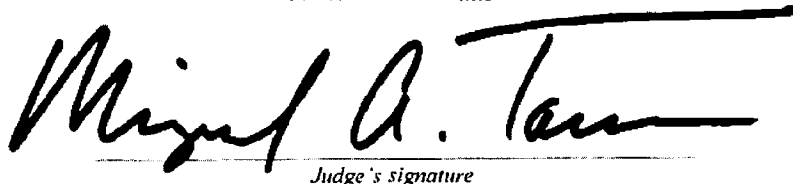
SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

Complaint sworn to telephonically on

August 24, 2022 at 02:00 PM and signed
electronically. **FED.R.CRIM.P. 4.1(b)(2)(A)**
Complainant's signatureJuan Ortiz, Special Agent
Printed name and title

Sworn to before me and signed in my presence.

Date: 08/24/2022
Judge's signatureCity and state: El Paso, TexasMiguel A. Torres, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT

On August 23, 2022, an HSI undercover agent (UCA) called an unidentified Hispanic male to arrange the purchase of 20,000 fentanyl pills for \$70,000.00. Various phone conversations took place the morning of August 23, 2022, between the unidentified Hispanic male and the UCA to arrange a meeting and conduct the transaction. They agreed to conduct the transaction at a parking lot located at the 6300 block of Gateway Blvd. West in El Paso, which is in the Western District of Texas. The unidentified Hispanic male told the UCA that a female would deliver the fentanyl. Agents then set up surveillance at the parking lot.

At approximately 1:30 p.m., agents saw a white minivan taxi arrived at the Taco Cabana restaurant located at 6345 Gateway Blvd. West. A Hispanic female later identified as Veronica Rodriguez-Hernandez (RODRIGUEZ) exited the taxi and proceeded to enter the Taco Cabana. The UCA met with RODRIGUEZ and asked if she had the package. RODRIGUEZ stated that it was taped to her body.

The UCA and RODRIGUEZ then walked to the UC vehicle and got into the vehicle. RODRIGUEZ removed two plastic bags containing blue pills, which were strapped to her torso. The UCA then gave the arrest signal and RODRIGUEZ was arrested without incident.

The plastic bags containing the blue pills were transported to 11541 Montana Avenue and turned over to Seized Property Specialist. A field test was conducted of the blue pills, which tested positive for the properties of fentanyl. The two bags with the pills had a total gross weight of 2.25 kilograms.

Subsequently, HSI Special Agent (SA) Juan Ortiz and HSI Task Force Officer (TFO) Joseph Guevara met with RODRIGUEZ and read her the Miranda Warning in Spanish. She stated she understood her rights and agreed to speak to agents without the presence of an attorney.

RODRIGUEZ stated she traveled to Cd. Juarez from Durango, Mexico to look for work, and in Cd. Juarez she answered a Facebook ad for work. RODRIGUEZ stated she was contacted by an unknown female, who then referred her to an unknown male. The unknown male spoke with RODRIGUEZ in Cd. Juarez, where they discussed the details of the job, which involved smuggling packages of unknown contents from Cd. Juarez to the United States.

RODRIGUEZ advised that on August 22, 2022, at approximately 8:00 p.m., an unknown male met with her at her hotel and delivered two bags containing blue pills. She stated the understanding was she would be smuggling the two packages containing the blue pills from Cd. Juarez to the United States and then delivering the packages once she had been given their destination.

RODRIGUEZ advised that on August 23, 2022, at approximately 10:00 a.m., another young unknown Hispanic male returned to her hotel and advised her that she would be taking the packages to El Paso, Texas. RODRIGUEZ stated that the unknown male asked her husband for help, and they both strapped the two packages to her abdominal

area. RODRIGUEZ stated they used a medical bandage wrap and girdle to strap the packages to her body.

SA Ortiz asked RODRIGUEZ if she knew the packages contained illegal drugs, and she stated yes but did not know what kind of illegal drugs.

SA Ortiz asked RODRIGUEZ how much she was getting paid to smuggle the illegal drugs from Juarez to the United States, and RODRIGUEZ stated she was going to be paid \$200.00 by an unidentified Hispanic male upon completion of the job and returning to Juarez, Mexico.

SA Ortiz asked RODRIGUEZ if she knew that delivering drugs was illegal and RODRIGUEZ stated, "Yes." RODRIGUEZ further advised her husband warned her not to do something illegal. RODRIGUEZ advised SA Ortiz that this was the first time she had delivered illegal narcotics into the United States from Mexico.